

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE INNOCENCE PROJECT, INC.

Plaintiff,

v.

NATIONAL MUSEUM OF HEALTH AND
MEDICINE, et al.,

Defendants.

Case No. 19-cv-1574-AJN

NOTICE OF FILING

Plaintiff's counsel submits this notice and the attached exhibit in connection with the pending motion to lift the protective order in this matter with respect to a certain document found in the archives of the National Museum of Health and Medicine. ECF Nos. 39, 42, 45. The Court invited both the author of the document in question and its subject to provide their views to the Court regarding potential disclosure. ECF No. 45. The Court extended the deadline for such submissions through January 31, 2020, following a request from the document's author. ECF No. 51.

Attached, as Exhibit A, is a letter from the subject of the document in question to the Court addressing this matter and explaining that he does not oppose disclosure. He transmitted the attached letter, signed and dated January 15, 2020, to undersigned counsel by electronic means. On Tuesday, January 28, 2020, he asked undersigned counsel to submit the letter to the Court on his behalf. While we do not represent him, we are submitting the letter to the Court per his request so that the Court has the benefit of his views.

A motion to seal the attached exhibit is being filed concurrently with this Notice because it contains information that remains subject to the nondisclosure requirements of the protective order pending the Court's resolution of the present litigation. Defendant's counsel takes no position regarding the filing of this notice.

Respectfully submitted,

/s/Jonathan Manes

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Dated: January 31, 2020
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